

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Yongping Wang :
Debtor : BANKRUPTCY NO.: 19-16681-jkf

RESPONSE TO MOTION FOR RELIEF

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. Movant refers to documents on record before the Court. Said documents speak for themselves. The Debtor does not attest to the veracity of said documents, and therefore the averments referencing said documents in the corresponding paragraph are denied.
4. Admitted.
5. Admitted.
6. Denied. The Debtor is without requisite knowledge of attest the veracity of Movant's averment.
7. The Debtor intends to cure any post-petition payments that may be due at this time.
8. The Debtor intends to cure all post-petition payments, which may be due at this time.
9. Denied. Debtor has paid the trustee \$2,100.00 to the Chapter 13 Trustee and his completely current on his plan payments.
10. Denied. Movant's averment is a conclusion of law to which no response is required. Said averment is therefore denied.
11. Denied. Movant's averment does not call for a response.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Date: March 2, 2020

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.